

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	Case No. 19-cr-00833 (SHS)
UNITED STATES OF AMERICA,	:	
	:	
	:	
-v.-	:	
	:	
ANTHONY CHEEDIE, <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
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DECLARATION OF RYAN P. POSCABLO

Ryan P. Poscablo, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am an attorney in the law firm Riley Safer Holmes & Cancila LLP, and I am counsel for Defendant Cameron Brewster (“Mr. Brewster”) in this action. I am admitted to the bar of this Court. I submit this Declaration in support of Mr. Brewster’s Pretrial Omnibus Motion for a Bill of Particulars and to Suppress Certain Evidence, Obtain Discovery, and Obtain Other Related Relief (“Omnibus Motions”).

2. On November 16, 2020, my co-counsel Sandra Musumeci and I engaged in a telephone conference call with AUSAs Kiersten A. Fletcher, Benet J. Kearney, and Robert B. Sobelman, who represent the Government in the prosecution against Mr. Brewster.

3. During the call, we conferred about a variety of issues relevant to Mr. Brewster’s Omnibus Motions, including our request for a bill of particulars to obtain further details about the Government’s allegations about Mr. Brewster, our request for *Brady* material pertaining to

Mr. Brewster, and our request for context surrounding approximately ten audio recordings involving CW-3 and Mr. Brewster, as well as other audio recordings involving CW-3.

4. As relevant to the Omnibus Motions, the Government indicated on the call that they have not identified any material that they view as *Brady* material concerning Mr. Brewster, even after conducting reasonable investigation into Mr. Brewster's representations in his brief about an unnamed purported "victim" who was approached by a law enforcement agent and denied that she had been victimized.

5. After good faith efforts by the prosecution and counsel for Mr. Brewster to resolve the issues raised in the Omnibus Motions, as required pursuant to Local Criminal Rule 16.1, the parties continue to disagree. Accordingly, Mr. Brewster renews his request that the Court grant the relief sought in the Omnibus Motions.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 17, 2020

Respectfully submitted,

/s/ Ryan P. Poscablo

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